

STATEMENT OF BASIS (AI No. 154790)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0123889 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Savoie's Alligator Farm
16124 Hwy 3235
Cutoff, LA 70345

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Ronda Burtch

REVISED BY: Lisa Kemp

DATE PREPARED: February 2, 2009; revised April 7, 2009

1. PERMIT STATUS**A. Reason For Permit Action:**

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A

C. LPDES permits - LPDES permit effective date: N/A
LPDES permit expiration date: N/A

D. Date Application Received: April 10, 2008

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - alligator farm and processing facility**

Savoie's Alligator Farm, LLC is an alligator farm and skinning facility raising approximately 50,000 animals. New houses are under construction, but currently there are no plans to handle more animals. The new houses will allow for fewer animals per house to increase growth rate. Alligators are raised from eggs to ~ 4 ft in length. At market size, they are skinned. Skins are pressure washed to remove fats, salted, and shipped. Whole carcasses are sold to meat processors.

Instead of standard pen washing, the facility uses a recirculating water system. Only the pens of small gators (0-4 months of age) are emptied and washed out every three days. All other pens are designed to constantly flow water over the alligators. Water is withdrawn from a pond that opens to a small canal off of 40-Acre Canal. 40-Acre Canal is a storm canal behind the levee system maintained by the parish. Mr. Savoie's smaller canal is across from the municipal pump station and is part of his treatment system. House washwater, recirculating water, skinning shed washwater, condensate from the ice machines, and all stormwater flows to a series of holding/oxidation ponds. The STP discharges to the intake pond. Occasionally, during high rainfall events, this last pond

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(also the intake pond) may discharge back to the 40-Acre Canal. Under normal operating conditions, the pond does not discharge. The facility has two boilers. Water temperature in the houses is maintained at ~ 86 F. The boilers hospital grade and have no blowdown discharges. The facility does not use any additives prior to recirculating water.

The facility withdraws 0.02 MGD freshwater from 40-Acre Canal and 0.35 MGD is used from on-site stabilization/oxidation ponds for washwater. An additional 0.12 MGD from the parish water supply is used from August through March for skinning area washing. This facility withdraws less than 2 MGD. Therefore it is not subject to 316b regulation.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II – BPJ points to 0. Bulk of operations and discharge are from farming operations. BPJ points similar to other permitted facilities.
3. Wastewater Type: II
4. SIC code: 0279 (Animal Specialties), 5159 (Farm-product Raw Materials)

C. LOCATION - 486 W. 107th St., Cutoff, Lafourche Parish
 Latitude 29° 28' 21", Longitude 90° 20' 21"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: intermittent discharge of alligator house washwater/recirculating water, skinning area washdown, sanitary wastewater, condensation from the ice machines, floor washwater, and non-industrial stormwater
 Treatment: oxidation pond/recirculating system
 Location: at the point of discharge back to 40-Acre Canal, prior to mixing with any other waters
 Flow: intermittent, variable with rainfall
 Discharge Route: 40-Acre Canal

4. RECEIVING WATERS

STREAM - 40-Acre Canal

BASIN AND SEGMENT - Terrebonne Basin, Segment 120706

DESIGNATED USES -

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife
- d. oyster propagation*

* Oyster propagation is listed as a designated use of Subsegment 120706 – Bayou Blue from Bully Camp Canal to Lake Raccourci (Estuarine). However, this designated use is applicable only if the discharge is directly into the named waterbody and not into tributaries or distributaries of the waterbody per LAC 33:IX.1111.A.

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5. TMDL STATUS

Subsegment 120706, Bayou Blue – From Bully Camp Canal to Lake Raccourci, is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

7. COMPLIANCE HISTORY/COMMENTS

- A. OEC – There are no water inspections or compliance orders on file as of January 28, 2008.
- B. DMR Review/Excursions – There are no DMRs on file as of January 28, 2008. This is an initial discharge permit.

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 120706 of the Terrebonne Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

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Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for Savoie's Alligator Farm

1. **Outfall 001** – intermittent discharge of alligator house washwater/recirculating water, skinning area washdown, sanitary wastewater, condensation from the ice machines, floor washwater, and non-industrial stormwater (estimated flow is intermittent, variable)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	Mg/L		
Flow (gpd)	Report	Report	LAC33:IX.2705.1.1.b
CBOD ₅	25	40	*1, *3, BPJ
TSS	90	135	*1, *3, BPJ
Ammonia	20	30	*3, BPJ
Fecal Coliform Colonies/100ml	200	400	*2, *3, BPJ
pH, s.u.	6.0 (min)	9.0 (max)	*2, *3, BPJ

Treatment: oxidation pond/recirculating system

Monitoring Frequency: 1/discharge event

Limits Justification:

40 CFR 451 does not apply to alligator farming operations. While 40 CFR 432 is applicable to the discharge of process water (washwater associated with defleshing hides), these mass-based limitations have not been applied in this permit. Outfall 001 is expected to discharge only during high rainfall events. Therefore, the flow from Outfall 001 is expected to be highly intermittent and variable in nature. In cases where flow is variable, concentration limits have been deemed more appropriate for protection of the receiving waterbody.

Flow: Flow reporting is required by LAC 33:IX.2705.1.1.b.

CBOD₅, TSS: Limits are based on secondary treatment standards and similar, permitted facilities.

Fecal Coliform, pH: Limits are based on numerical criteria and similar, permitted facilities.

Ammonia-Nitrogen: Limit is based on similar, permitted facilities. It has been included to prevent ammonia toxicity in the receiving stream.

(*1) LAC 33:IX.5905 and LAC 33:IX.711.D

(*2) LAC 33:IX.1113.C

(*3) permits for similar alligator farming facilities

BPJ Best Professional Judgement

su Standard Units

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STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

As per LAC 33:IX.2511.B.14.a-k, storm water discharges from facilities classified as SIC code 0279 and 5159 are not considered to be associated with industrial activities. Therefore, an SWP3 is not included in the permit.